

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

TERRY HARRIS, et al.,

Plaintiffs,

vs.

JOSEPH BORG,

Defendant.

Case No. : 2:05CV1083-MEF

**AFFIDAVIT IN SUPPORT OF PLAINTIFFS'
SECOND MOTION TO AMEND ORIGINAL COMPLAINT**

**STATE OF ALABAMA)
COUNTY OF JEFFERSON)**

Before me, the undersigned notary in and for said state and county personally appeared Terry Harris, who being known to me and being duly sworn under oath that the following facts are true and correct:

1. I am Terry Harris, a plaintiff in the above action and a member of Wealth Builders International Investment Club (hereinafter "WBI").
2. More than 900 individuals are members of WBI.
3. Wealth Builders International was managed by a core group of people. One of these individuals was Hulbert Van Barringer, a White male.
4. Barringer was listed as President of Wealth Builders in its proposed Articles of Incorporation.
5. Defendant Borg, during his investigation of Harris, Wealth Builders International, LLC and WBI, knew that Barringer had access to the WBI/Schwab Account and traded stocks and options on this account without a license.
6. Borg, as Commissioner of the Alabama Securities Commission, did not prosecute Barringer, but did prosecute me, a Black male.
7. On June 10, 2003, the Alabama Securities Commission froze funds in the WBI/Schwab account. This account contained options that had to be traded by the expiration dates. Failure to trade by the expiration dates

would result in financial losses. Once Borg froze the WBI/Schwab account, I did not have access to trade on the account, and its constituents sustained substantial financial losses.

8. The WBI/Schwab account was frozen and funds were taken by Borg without a final hearing, as required by Alabama's Administrative Procedure Act. §§41-22-12, 41-22-16, Code of Alabama (1975).
9. I was never given the opportunity to have a licensed advisor and/or broker appointed to trade the options and preserve their value, nor did Borg appoint a licensed broker to trade the account.
10. Borg willfully violated his fiduciary duty to preserve the value in the WBI/Schwab account.
11. This willful and reckless violation of his duty caused a loss and taking of property owned by me and other members of WBI.


Terry Harris, Affiant

Sworn to and subscribed by me this 2nd day of January, 2007.


NOTARY PUBLIC

My Commission Expires: 03/13/2007